

KELLETT & BARTHOLOW PLLC
Theodore O. Bartholow, III ("Thad")
Texas Bar No. 24062602
Karen L. Kellett
Texas Bar No. 11199520
11300 N. Central Expy., Ste 301
Dallas, Texas 75243
Phone: (214) 696-9000
Fax: (214) 696-9001
Counsel for Plaintiffs

Leonard A. Bennett, (pro hac vice)
Elizabeth W. Hanes, (pro hac vice)
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Blvd., Ste. 1-A
Newport News, VA 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
Email: lenbennett@clalegal.com
Email: elizabeth@clalegal.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|-------------------------------------|---|-------------------------|
| IN RE: | : | |
| | : | |
| THINK FINANCE, LLC, <i>et al.</i> , | : | Chapter 11 |
| | : | |
| | : | Case No. 17-33964 (HDH) |
| Debtors. | : | |
| | : | (Jointly Administered) |
| | : | |

**MOTION TO AUTHORIZE BANKRUPTCY RULE 7023 TO VIRGINIA PLAINTIFFS'
PROOF OF CLAIMS AND TO CERTIFY CLASS OF VIRGINIA CONSUMERS**

Pursuant to Rule 9014 of the Federal Bankruptcy Rules and Rule 23 of the Federal Rules of Civil Procedure, Patrick Inscho, Stephanie Edwards, Lula Williams, Darlene Gibbs, and Lawrence Mwethuku, by counsel, respectfully move to apply Rule 23 to Plaintiffs' Proof of Claims and to certify a class of Virginia consumers for the reasons explained in the accompanying brief in support of this motion.

Respectfully submitted,

/s/ Theodore O. Bartholow
KELLETT & BARTHOLOW PLLC
Theodore O. Bartholow, III ("Thad")
Texas Bar No. 24062602
Karen L. Kellett
Texas Bar No. 11199520

Leonard A. Bennett, (pro hac vice)
Elizabeth W. Hanes, (pro hac vice)
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Blvd., Ste. 1-A
Newport News, VA 23601
Telephone: (757) 930-3660

11300 N. Central Expy., Ste 301
Dallas, Texas 75243
Phone: (214) 696-9000
Fax: (214) 696-9001

Facsimile: (757) 930-3662
Email: lenbennett@clalegal.com
Email: elizabeth@clalegal.com

Kristi C. Kelly, (pro hac vice)
Casey S. Nash, (pro hac vice)
KELLY & CRANDALL, PLC
3925 Chain Bridge Road, Suite 202
Fairfax, VA 22030
(703) 424-7572
(703) 591-0167 Facsimile
Email: kkelly@kellyandcrandall.com
Email: casey@kellyandcrandall.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2018, I forwarded a copy of the foregoing
via electronic transmission and regular mail to the following counsel of record:

Gregory G. Hesse
HUNTON & WILLIAMS LLP
1445 Ross Avenue
Suite 3700
Dallas, Texas 75209
Email: ghesse@hunton.com

Tyler P. Brown (admitted *pro hac vice*)
Jason W. Harbour (admitted *pro hac vice*)
HUNTON & WILLIAMS LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, Virginia 23219
Email: tpbrown@hunton.com
jharbour@hunton.com

Counsel to the Debtors and Defendants

/s/ Theodore O. Bartholow, III (“Thad”)
Theodore O. Bartholow, III (“Thad”)